

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO**

In re:

Robert Nichols
Rachel Nichols

Debtor(s)

) Chapter 13 Bankruptcy

) Case No. 21-60899

) Judge: Russ Kendig

) **RESPONSE TO THE OBJECTION TO**
) **PLAN CONFIRMATION FILED BY US**
) **BANK TRUST NATIONAL**
) **ASSOCIATION**

Now come Debtors, Robert Nichols and Rachel Nichols, by and through undersigned counsel, and submit the following response to the Objection to Plan Confirmation filed by Creditor US Bank National Trust Association (Docket # 16, Filed July 7, 2021).

The Creditor's objection is based on the assertion that the mortgage arrearage is understated in the chapter 13 plan. No proof of claim has been filed to reflect the arrearage, and the Debtors dispute the assertion that the arrearage is \$111, 292.96 based on an existing agreement between the parties. The Debtors have requested an accounting from the Creditors.

THEREFORE, the Debtors request that the Creditor's objection be overruled.

Respectfully submitted by

/S/ Christopher A. Crull

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CERTIFICATE OF SERVICE

I CERTIFY that a true and correct copy of the foregoing was served:

Via the Court's Electronic Case Filing System to these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Keith Rucinski, Chapter 13 Trustee at krucinski@ch13akron.com, efilings@ch13akron.com

Office of the U.S. Trustee at [registered address@usdoj.gov](mailto:registered_address@usdoj.gov)

Via regular US Mail, postage pre-paid on:

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Date: 6/4/2021

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